

0F764 - U2 Franklin County Ohio Clerk of Courts of the Common Pleas- 2022 Jan 12 1:10 PM-22CV000260

IN THE COURT OF COMMON PLEAS FOR FRANKLIN COUNTY, OHIO
CIVIL DIVISION

QUINTON WILLIAMS
6319 VINCENT GEORGE DRIVE
CANAL WINCHESTER, OHIO 43110

PLAINTIFF,

VS.

PASCHALL TRUCK LINES, INC.
c/o David A. Gibbs, Statutory Agent
3443 HIGHWAY 641 SOUTH
MURRAY, KENTUCKY 42071

AND

CRAIG SIEGEL
5223 FIRETOWER ROAD
KILN, MISSISSIPPI 39556

DEFENDANTS.

CASE NO.: _____

ORIGINAL CASE NO: 19 CV 009738

JUDGE RICHARD FRYE

RE- FILED COMPLAINT

1. On or about August 30, 2019, Plaintiff, Quinton Williams, was parked in his truck at L Brands, Inc. World Headquarters, in the City of Columbus, in Franklin County, Ohio, when a semi-truck owned by Defendant, Paschall Truck Lines Inc., and driven by Defendant, Craig Siegel, failed to yield on a right turn and forcefully collided with the Plaintiff's vehicle, resulting in the damages, injuries and consequences as hereinafter set forth.

2. At the time of the incident described in paragraph one (1), Defendant, Craig Siegel, was an employee of Defendant, Paschall Truck Lines, Inc., acting within the course and scope of his employment, as a result of which Defendant, Paschall Truck Lines Inc., was vicariously liable for said Defendant's actions under the doctrine of *respondeat superior*.

EXHIBIT

A

OF764 - U3 Franklin County Ohio Clerk of Courts of the Common Pleas- 2022 Jan 12 1:10 PM-22CV000260

3. Defendant, Craig Siegel, negligently and unlawfully:
 - a. failed to yield while making a right turn;
 - b. drove left of center;
 - c. failed to maintain control over his vehicle;
 - d. failed to maintain his attention on the roadway ahead;
 - e. drove his vehicle at an excessive rate of speed; and
 - f. caused or permitted to cause his vehicle to strike Plaintiff's truck.
4. As a direct and proximate result of the Defendants' conduct, Plaintiff, Quinton Williams, has:
 - a. sustained severe injuries to his head, neck and back;
 - b. suffered and will continue to suffer physical pain, mental anguish, and emotional distress;
 - c. required and will continue to require medical care, attention, and treatment, with resulting expenses;
 - d. sustained and will continue to sustain a loss of earnings and earnings capacity;
 - e. sustained property damage to, reduction in the value of, and loss of the use of his vehicle, including storage and interest charges; and
 - f. suffered and will continue to suffer impairment in the use of the affected areas of his body and a reduction in the quality and enjoyment of his life.

Said damages and injuries are permanent.

WHEREFORE, Plaintiff, Quinton Williams, now demands judgment against

OF764 - U4 Franklin County Ohio Clerk of Courts of the Common Pleas- 2022 Jan 12 1:10 PM-22CV000260

Defendants, Craig Siegel and Paschall Truck Lines, Inc., in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) as compensatory damages, in addition to interest, and his costs incurred herein.

Respectfully submitted,

/s/ Megan R. Hayden

*Megan R. Hayden (0093416)

Terry V. Hummel (0025567)

Scott W. Schiff & Assoc. Co., L.P.A.

115 West Main Street, Suite 100

Columbus, Ohio 43215

Telephone: (614) 621-8888

Facsimile: (614) 621-8814

mhayden@scottschiff.com

thummel@scottschiff.com

Attorneys for Plaintiff

*Please send all correspondence regarding this case to this attorney only.